

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA**

<b>UNITED STATES OF AMERICA,</b>	)	
<b>STATE OF LOUISIANA,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil No.</b>
	)	
<b>CALCASIEU REFINING COMPANY,</b>	)	
	)	
<b>Defendant.</b>	)	
_____	)	

**COMPLAINT**

The United States of America, by the authority of the Attorney General of the United States and through the undersigned attorneys, acting at the request of the Administrator of the United States Environmental Protection Agency (“EPA”); the State of Louisiana (“Louisiana”), by and through its Attorney General, on behalf of the people of the State of Louisiana, and the Louisiana Department of Environmental Quality (“LDEQ”), by and through its Secretary, alleges:

**NATURE OF ACTION**

1. This is a civil action brought by the United States against Calcasieu Refining Company (“Calcasieu” or “Defendant”) under Section 113 of the Clean Air Act (“CAA” or “the Act”), 42 U.S.C. § 7413; and the Louisiana Environmental Quality Act, LSA-R.S. 30:2001 et seq., for alleged violations of the Act at its petroleum refinery located in Lake Charles, Louisiana (“Lake Charles Refinery”).

2. Upon information and belief, the Lake Charles Refinery has been and is in violation of: (1) Sections 111 and 112 of the Act, 42 U.S.C. §§ 7411 and 7412, and the implementing

regulations applicable to the petroleum refining industry for New Source Performance Standards (“NSPS”) found at 40 C.F.R. Part 60, Subparts A and J, for fuel gas combustion devices (“Refinery NSPS Regulations”); (2) Leak Detection and Repair (“LDAR”) requirements found at 40 C.F.R. Part 60 Subparts VV and GGG; 40 C.F.R. Part 61, Subparts J and V; and 40 C.F.R. Part 63, Subparts F, H, and CC (“LDAR Regulations”); (3) Prevention of Significant Deterioration (“PSD”) requirements found at Part C of Subchapter I of the Act, 42 U.S.C. § 7475, and the regulations promulgated thereunder at 40 C.F.R. § 52.21 (the “PSD Rules”); and “Plan Requirements for Non-Attainment Areas” at Part D of subchapter I of the Act, 42 U.S.C. § 7502-7503 and the regulations promulgated thereunder at 40 C.F.R. § 51.165(a) and (b) and at Title 40, Part 51, Appendix S and at 40 C.F.R. § 52.24 (“PSD/NSR Regulations”) for heaters and boilers for nitrogen oxide (“NO<sub>x</sub>”) and sulfur dioxide (“SO<sub>2</sub>”); and (4) National Emission Standards for Hazardous Air Pollutants (“NESHAP”) for Benzene Waste Operations promulgated pursuant to Section 112(e) of the Act, and found at 40 C.F.R. Part 61, Subpart FF (“Benzene Waste Operations NESHAP Regulations”).

3. Upon information and belief, the Lake Charles Refinery has been and is in violation of the Louisiana Environmental Quality Act, and its implementing regulations at the Environmental Regulatory Code Title 33:Part III, which incorporates and/or implements the federal regulations cited in Paragraph 2.

4. The United States and Louisiana seek an injunction ordering Calcasieu to comply with the above statutes and the laws and regulations promulgated thereunder, and civil penalties for Defendant's past and ongoing violations.

**JURISDICTION AND VENUE**

5. This Court has jurisdiction over the subject matter pursuant to 28 U.S.C. §§ 1331, 1345, 1355 and 1367; and Sections 113(b) and 167 of the CAA, 42 U.S.C. §§ 7413(b) and 7477.

6. Venue is proper in the Western District of Louisiana pursuant to 28 U.S.C. §§ 1391(b), (c), and 1395(a), and Section 113(b) of the CAA, 42 U.S.C. § 7413(b), because the violations alleged occurred at the Lake Charles Refinery which is located in this judicial district.

**AUTHORITY AND NOTICE TO STATE**

7. Authority to bring this action is vested in the United States Department of Justice. *See, e.g.*, Section 113(b) and 305 of the CAA, 42 U.S.C. §§ 7413(b) and 7605, and 28 U.S.C. §§ 516 and 519.

8. Pursuant to Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1), notice of the violations of the Louisiana SIP that are alleged in this complaint has been given to the State of Louisiana and to Calcasieu at least 30 days prior to the filing of this complaint.

9. Pursuant to Section 113(b) of the CAA, 42 U.S.C. § 7413(b), notice of the commencement of this action has been given to the appropriate state air pollution control agency in the State of Louisiana.

**DEFENDANT**

10. Defendant Calcasieu is incorporated in Delaware and wholly owned by Transworld Oil U.S.A., Inc., located in Houston, Texas. Calcasieu owns and operates the Lake Charles Refinery located on 4359 W. Tank Farm in Lake Charles, Louisiana.

11. For the purposes of Section 113(b) of the CAA, 42 U.S.C. § 7413(b), Calcasieu is

and has been a “person” as defined in Section 302(e) of the CAA, 42 U.S.C. § 7602(e), and applicable federal and state regulations promulgated pursuant to this statute.

12. Calcasieu is an “owner or operator,” within the meaning of Section 111(a)(5) of the CAA, 42 U.S.C. § 7411(a)(5), and 40 C.F.R. § 60.2, of flaring devices and heaters and boilers located at the Lake Charles Refinery.

### **STATUTORY AND REGULATORY BACKGROUND**

13. The Clean Air Act established a regulatory scheme designed to protect and enhance the quality of the nation's air so as to promote the public health and welfare and the productive capacity of its population. Section 101(b)(1) of the Act, 42 U.S.C. § 7401(b)(1).

### **Prevention of Significant Deterioration/New Source Review**

14. Part C of Title I of the Act, 42 U.S.C. §§ 7470-7492, sets forth requirements for the prevention of significant deterioration (“PSD”) of air quality in those areas designated as attaining the NAAQS standards. These requirements are designed to protect public health and welfare, to assure that economic growth will occur in a manner consistent with the preservation of existing clean air resources, and to assure that any decision to permit increased air pollution is made only after careful evaluation of all the consequences of such a decision and after public participation in the decision-making process. These provisions are referred to herein as the “PSD program.”

15. Section 165(a) of the Act, 42 U.S.C. § 7475(a), prohibits the construction and subsequent operation of a major emitting facility in an area designated as attainment unless a PSD permit has been issued. Section 169(1) of the Act, 42 U.S.C. § 7479(1), defines “major

emitting facility" as a source with the potential to emit 250 tons per year (tpy) or more of any air pollutant.

16. As set forth at 40 C.F.R. § 52.21(k), the PSD program generally requires a person who wishes to construct or modify a major emitting facility in an attainment area to demonstrate, before construction commences, that construction of the facility will not cause or contribute to air pollution in violation of any ambient air quality standard or any specified incremental amount.

17. As set forth at 40 C.F.R. § 52.21(i), any major emitting source in an attainment area that intends to construct a major modification must first obtain a PSD permit. "Major modification" is defined at 40 C.F.R. § 52.21(b)(2)(i) as meaning any physical change in or change in the method of operation of a major stationary source that would result in a significant net emission increase of any criteria pollutant subject to regulation under the Act. "Significant" is defined at 40 C.F.R. § 52.21(b)(23)(i) in reference to a net emissions increase or the potential of a source to emit any of the following criteria pollutants, at a rate of emissions that would equal or exceed any of the following: for ozone, 40 tons per year of volatile organic compounds (VOCs); for carbon monoxide (CO), 100 tons per year; for nitrogen oxides (NO<sub>x</sub>), 40 tons per year; for sulfur dioxide (SO<sub>2</sub>), 100 tons per year, (hereinafter "criteria pollutants").

18. As set forth at 40 C.F.R. § 52.21(j), a new major stationary source or a major modification in an attainment area shall install and operate best available control technology ("BACT") for each pollutant subject to regulation under the Act that it would have the potential to emit in significant quantities.

19. Section 161 of the Act, 42 U.S.C. § 7471, requires SIPs to contain emission limitations and such other measures as may be necessary, as determined under the regulations promulgated pursuant to these provisions, to prevent significant deterioration of air quality in attainment areas.

20. A state may comply with Section 161 of the Act either by being delegated by EPA the authority to enforce the federal PSD regulations set forth at 40 C.F.R. § 52.21, or by having its own PSD regulations approved as part of its SIP by EPA, which must be at least as stringent as those set forth at 40 C.F.R. § 51.166.

21. Pursuant to PSD regulations, any owner or operator who commences construction or modification of a major source without applying for and receiving approval for such construction or modification is subject to an enforcement action. 40 C.F.R. § 51.166.

22. Pursuant to Section 113(b)(1) of the CAA, 42 U.S.C. § 7413(b)(1), the violation of any requirement or provision of an applicable implementation plan is a violation of the CAA.

23. Whenever any person has violated, or is in violation of, any requirement or prohibition of any SIP, Section 113(b) of the Act, 42 U.S.C. § 7413(b), authorizes the Administrator to initiate a judicial enforcement action for a permanent or temporary injunction, and/or for a civil penalty of up to \$25,000 per day for each violation occurring before January 31, 1997; up to \$27,500 per day for each such violation occurring on or after January 31, 1997 and before March 15, 2004; and up to \$32,500 for each such violation occurring after March 15, 2004, pursuant to the Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461, as amended.

### **New Source Performance Standards**

24. Section 111(b)(1)(A) of the Act, 42 U.S.C. § 7411(b)(1)(A), requires the Administrator to publish a list of categories of stationary sources that cause or significantly contribute to air pollution which may reasonably be anticipated to endanger public health or welfare. The Administrator has identified petroleum refineries as one such category.

25. Section 111(b)(1)(B) of the Act, 42 U.S.C. § 7411(b)(1)(B), requires the Administrator to promulgate regulations establishing federal standards of performance for new sources of air pollutants within each category. “New sources” are defined as stationary sources, the construction or modification of which is commenced after the publication of regulations or proposed regulations prescribing a standard of performance applicable to such source. 42 U.S.C. § 7411(a)(2). These standards are known as the New Source Performance Standards (“NSPS”).

26. NSPS requirements for petroleum refineries are codified in 40 C.F.R. Part 60, Subpart J, §§ 60.100-60.109.

27. EPA also promulgated general NSPS provisions, codified at 40 C.F.R. Part 60, Subpart A, §§ 60.1-60.19, that apply to owners or operators of any stationary source that contains an “affected facility” subject to regulation under 40 C.F.R. Part 60.

### **Leak Detection and Repair**

28. Pursuant to Section 111 of the CAA, 42 U.S.C. § 7411, EPA promulgated New Source Performance Standards for Equipment Leaks of VOCs at Petroleum Refineries in the LDAR Regulations.

29. The focus of the LDAR program is the refinery-wide inventory of all possible leaking equipment, the regular monitoring of that equipment to identify leaks, and the repair of leaks as soon as they are identified.

### **Benzene Waste NESHAP**

30. The CAA requires EPA to establish emission standards for each “hazardous air pollutant” (“HAP”) in accordance with Section 112 of the CAA, 42 U.S.C. § 7412.

31. In March 1990, EPA promulgated national emission standards applicable to benzene-containing waste waters. Benzene is a listed HAP and a known carcinogen. The benzene waste regulations are set forth at 40 C.F.R. Part 61 Subparts FF, (National Emission Standard for Benzene Waste Operations). Benzene is a naturally occurring constituent of petroleum product and petroleum waste and is highly volatile. Benzene emissions can be detected anywhere in a refinery where the petroleum product or waste materials are exposed to the ambient air.

32. Pursuant to the Benzene waste NESHAP, refineries are required to tabulate the total annual benzene (“TAB”) content in their wastewater. If the TAB is over 10 Mg per year, the refinery is required to elect a control option for control of benzene.

33. Whenever any person has violated, or is in violation of, any requirement or prohibition of any applicable National Emission Standard for a Hazardous Air Pollutant, Section 113(b) of the CAA, 42 U.S.C. § 7413(b), Section 113(b) of the Act, 42 U.S.C. § 7413(b), authorizes the Administrator to initiate a judicial enforcement action for a permanent or temporary injunction, and/or for a civil penalty of up to \$25,000 per day for each violation

occurring before January 31, 1997; up to \$27,500 per day for each such violation occurring on or after January 31, 1997 and before March 15, 2004; and up to \$32,500 for each such violation occurring after March 15, 2004, pursuant to the Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461, as amended.

### **Title V Air Operating Permit**

34. Title V of the Act, 42 U.S.C. §§ 7661-7661f, establishes an air operating permit program for certain sources that emit air pollutants. Title V does not impose new substantive requirements but allows States to issue operating permits setting emission limits and standards for individual sources in accordance with applicable requirements, including NSPS and LDAR requirements. 40 C.F.R. §§ 70.1(b), 70.6.

35. EPA approved Louisiana's Title V air operating permit program effective October 12, 1995. 60 Fed. Reg. 47296-49297; 40 C.F.R. Part 70. The regulations governing Louisiana's Title V air operating permit program are set forth at La. Admin. Code 33:III.

36. Section 502(a) of the Act, 42 U.S.C. § 7661a(a), and La. Admin. Code 33:III.507.B.2 have at all relevant times made it unlawful for any person to violate any requirement of a permit issued under Title V or to operate a regulated source except in compliance with a permit issued under Title V.

37. Whenever any person has violated, or is in violation of, any requirement or prohibition of any applicable New Source Performance Standard, LDAR requirement, or Title V air operating permit, Section 113(b) of the Act, 42 U.S.C. § 7413(b), authorizes the United States to commence a civil action for a permanent or temporary injunction, and/or for a civil penalty of

up to \$27,500 per day for violations occurring on or before March 20, 2004, and up to \$32,500 per day for each such violation occurring after that date.

**FIRST CLAIM FOR RELIEF**  
**(Failure to maintain complete LDAR records)**

38. Paragraphs 1 through 37 are re-alleged and incorporated herein.

39. Pursuant to 40 C.F.R. § 60.592(a), each owner or operator shall comply with the requirements of 40 C.F.R. §§ 60.482-1 through 60.482-10.

40. Pursuant to 40 C.F.R. § 60.486(c)(2) and (5), when a leak is detected, the owner or operator shall record in a log, which shall be kept for at least 2 years in a readily accessible location: the date the leak was detected; the date of each attempt to repair the leak; any repair delay; and the reason for delay, if a leak is not repaired within 15 calendar days after detection.

41. During a facility inspection on May 17-20, 2004, Calcasieu representatives were unable to locate records showing leak detection dates and attempted repair dates.

**SECOND CLAIM FOR RELIEF**  
**(Failure to submit detailed information in semi-annual LDAR report)**

42. Paragraphs 1 through 37 and Paragraph 39 are re-alleged and incorporated herein.

43. Pursuant to 40 C.F.R. § 60.487(a), each owner or operator shall submit semiannual reports to EPA beginning six months after the initial startup date.

44. Pursuant to 40 C.F.R. § 60.487(b), the initial semiannual report shall provide detailed information including, among other things, process unit identifications and compressors, valves and pumps subject to subpart GGG.

45. Calcasieu timely filed the initial semiannual report within six months of the initial

start-up but failed to include the number of pumps monitored as of start-up.

46. On September 30, 2000, March 29, 2001, September 28, 2001, and February 5, 2002, Calcasieu submitted semiannual reports that did not include all the information required by 40 C.F.R. § 60.487.

**THIRD CLAIM FOR RELIEF  
(NSPS Failure to provide notice of commencement of construction )**

47. Paragraphs 1 through 37 are re-alleged and incorporated herein.

48. Pursuant to 40 C.F.R. § 60.7, within 30 days of the commencement of construction of an “affected facility,” within the meaning of 40 C.F.R. §§ 60.2 and 60.100(a), each owner or operator shall notify EPA in writing.

49. Calcasieu commenced construction of “affected facilities,” in particular, a new heater, in June 2000 but never notified EPA.

**FOURTH CLAIM FOR RELIEF  
(PSD/NSR Violations at Heaters and Boilers)**

50. Paragraphs 1 through 37 are re-alleged and incorporated by reference as if fully set forth herein.

51. Calcasieu’s petroleum and asphalt refining processes result in emissions of significant quantities of criteria air pollutants, including nitrogen oxides (“NO<sub>x</sub>”), carbon monoxide (“CO”), particulate matter (“PM”), sulfur dioxide (“SO<sub>2</sub>”), as well as volatile organic compounds (“VOCs”) and hazardous air pollutants (“HAPs”), including benzene. The primary sources of these emissions are the process heaters and boilers.

52. Calcasieu’s Lake Charles Refinery is a “petroleum refinery” in accordance with

Section 169(1) of the CAA, 42 U.S.C. § 7479(1), which defines “major emitting facility” for certain listed stationary sources as a source with the potential to emit 100 TPY or more of any criteria air pollutant. Calcasieu’s petroleum refinery is a major emitting facility with the potential to emit in excess of 100 tpy of NO<sub>x</sub>, PM, and SO<sub>2</sub> which are listed criteria air pollutants.

53. At all times relevant to this Complaint, the Lake Charles Refinery was located in an area that was designated as “Class II” under Section 162(b) of the Act, 42 U.S.C. § 7472(b), and that has attained the National Ambient Air Quality Standards for Ozone, of which NO<sub>x</sub> is a precursor, SO<sub>2</sub>, and PM under Section 107(d) of the Act, 42 U.S.C. § 7407(d).

54. At all times relevant to the Complaint, and on numerous occasions since the commencement of operations, Calcasieu has failed to fully and accurately identify the emissions from the Lake Charles Refinery of one or more criteria pollutants.

55. During the time period relevant to this Complaint, upon information and belief, Calcasieu has modified its heaters and boilers at the Lake Charles Refinery.

56. Upon information and belief, such modification was a "major modification" within the meaning of 40 C.F.R. § 52.21(b)(2) to an existing major stationary source that resulted in a significant net emissions increase of NO<sub>x</sub> and SO<sub>2</sub> from the heaters and boilers.

57. Since the initial construction or major modification of the heaters and boilers, Calcasieu has been in violation of Section 165(a) of the CAA, 42 U.S.C. § 7475(a), and 40 C.F.R. § 52.21, and the corresponding state implementation plans, by failing to undergo PSD/NSR review for the heaters and boilers and by failing to obtain permits.

58. Unless restrained by an Order of the Court, these violations of the Clean Air Act and the implementing regulations will continue.

59. As provided in Section 113(b) of the Act, 42 U.S.C. § 7413(b), and Section 167 of the Act, 42 U.S.C. § 7477, the violations set forth above subject the defendant to injunctive relief and civil penalties of up to \$25,000 per day for each violation occurring prior to January 31, 1997; up to \$27,500 per day for each such violation occurring on or after January 31, 1997 and before March 15, 2004; and up to \$32,500 for each such violation occurring after March 15, 2004, pursuant to the Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461, as amended.

**FIFTH CLAIM FOR RELIEF**  
**(Benzene Waste NESHAP)**

60. The allegations in Paragraphs 1 through 37 are hereby re-alleged and incorporated by reference as if fully set forth herein.

61. At all times relevant to this Complaint, Calcasieu Refining Company asserted, incorrectly, that the Total Annual Benzene (“TAB”) at the Lake Charles Refinery was less than 10 megagrams per year and that the Lake Charles Refinery was not subject to the control requirements of 40 C.F.R. § 61.342.

62. Based on a review of permitting history and emissions data and an analysis of other relevant information concerning Calcasieu’s operation of its Lake Charles Refinery, Calcasieu Refining Company has failed to comply with the requirements of the Benzene Waste NESHAP that are applicable to facilities with a TAB of more than 10 megagrams per year.

63. Unless restrained by an order of the Court, these violations of the Act and the implementing regulations will continue.

64. As provided in Section 113(b) of the Act, 42 U.S.C. § 7413(b), and Section 167 of the Act, 42 U.S.C. § 7477, the violations set forth above subject the defendant to injunctive relief and civil penalties of up to \$25,000 per day for each violation occurring prior to January 31, 1997; up to \$27,500 per day for each such violation occurring on or after January 31, 1997 and before March 15, 2004; and up to \$32,500 for each such violation occurring after March 15, 2004, pursuant to the Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461, as amended.

**SIXTH CLAIM FOR RELIEF**  
**(Violation of Title V permit limit for H<sub>2</sub>S concentration in fuel gas)**

65. Paragraphs 1 through 37 are re-alleged and incorporated herein.

66. Pursuant to Calcasieu's Title V Air Operating Permit for the Lake Charles Refinery, fuel gas concentrations of H<sub>2</sub>S shall be below a limit of 150 milligrams per dry standard cubic meter, or approximately 105 parts per million (ppm).

67. Since January 26, 2004, the Lake Charles Refinery has exceeded the permitted fuel gas concentration for H<sub>2</sub>S at least five times as follows:

on January 26, 2004, a fuel gas concentration for H<sub>2</sub>S of 355 ppm was reported;

on February 4, 2004, a fuel gas concentration for H<sub>2</sub>S of 359 ppm was reported;

on April 22, 2004, a fuel gas concentration for H<sub>2</sub>S of 112 ppm was reported;

on April 27, 2004, a fuel gas concentration for H<sub>2</sub>S of 300 ppm was reported: and

on July 1, 2004, a fuel gas concentration for H<sub>2</sub>S of 115 ppm was reported.

**SEVENTH CLAIM FOR RELIEF**

**(Violation of Title V permit requirement for monitoring H<sub>2</sub>S concentration in fuel gas)**

68. Paragraphs 1 through 37 are re-alleged and incorporated herein.

69. Pursuant to Calcasieu's Title V air operating permit for the Lake Charles Refinery, the facility shall measure the level of H<sub>2</sub>S in its fuel gas.

70. On April 18, 1997, EPA approved an alternative monitoring procedure, requiring Calcasieu to monitor H<sub>2</sub>S concentration at least three times per day.

71. Between November 20, 2001 and May 1, 2003, on 11 days, Calcasieu failed to take at least 25 required measurements of the H<sub>2</sub>S in its fuel gas.

**EIGHTH CLAIM FOR RELIEF**

**(Violation of Title V permit requirement for monitoring equipment leaks)**

72. Paragraphs 1 through 37 are re-alleged and incorporated herein.

73. Pursuant to Calcasieu's Title V air operating permit for the Lake Charles Refinery, Calcasieu must have adequate LDAR procedures to maintain equipment leaks at valves and pumps below 500 ppm for components that are in organic hazardous air pollutant service. If a monitor measures 500 ppm, or greater, of an organic hazardous air pollutant, a leak is detected.

74. During a facility inspection in May 2004, EPA found 11 valves with leak rates greater than 500 ppm.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs, the United States and Louisiana, respectfully request that this

Court:

1. Order Calcasieu to immediately comply with the statutory and regulatory requirements cited in this Complaint, under the CAA and the corollary state acts;
2. Assess civil penalties against Calcasieu for up to the maximum amounts provided in the applicable statutes; and
3. Grant the United States and the State of Louisiana such other relief as this Court deems just and proper.

Respectfully submitted,

UNITED STATES DEPARTMENT OF JUSTICE

RONALD J. TENPAS  
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Environment and Natural Resources Division

Date: 8/5/08

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